

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**ARQUIDIOCESIS DE SAN JUAN
DE PUERTO RICO**

DEBTOR

CASE No. 18-04911 (EAG)

CHAPTER 11

**MOTION FOR LEAVE TO WITHDRAW AS CO-COUNSEL FOR THE
DIOCESE OF CAGUAS AND DIOCESE OF FAJARDO-HUMACAO**

TO THE HONORABLE COURT:

COMES NOW, Mary Ann Gandia-Fabian, co-counsel, and very respectfully
STATES and PRAYS:

1. This case commenced with the filing of a Chapter 11 petition under the
Bankruptcy Code on August 29, 2018. Dkt.1.
2. On September 21, 2018, an application for employment of co-counsel for the
Diocese of Caguas and the Diocese of Fajardo-Humacao was filed by Debtor.
Dkt. 61.
3. The application for employment was granted by the Honorable Court on
November 8, 2018. Dkt. 125.
4. Co-counsel wishes to withdraw as co-counsel in the case for both Dioceses.
Mons. Eusebio Ramos Morales, Bishop, has been informed of the request to
withdraw as co-counsel.
5. We certify having informed Monsignor Eusebio Ramos Morales of the status
of the case and the matters still pending resolution.

6. We have also informed about the need to hire new counsel.
7. The addresses of the Diocese of Caguas and the Diocese of Fajardo-Humacao are as follows:
 - a. Mons. Eusebio Ramos Morales, Bishop, HC 04 Box 44015, Caguas, Puerto Rico 00727-9639.
 - b. Father Miguel De Angel Ramirez, Vicario de Administracion for the Diocese of Caguas, HC 04 Box 44015, Caguas, Puerto Rico 00727-9639.
 - c. Father Victor Ramon Santiago Mateo, Vicario General for the Diocese of Fajardo-Humacao, PO Box 888, Fajardo, Puerto Rico 00738-0888.
 - d. Father Robert B. Medina Radesco, Diocese of Fajardo-Humacao, PO Box 888, Fajardo, Puerto Rico 00738-0888.
8. It is hereby requested that the pending matters and/or hearings be extended for an additional thirty (30) days to allow the Dioceses to obtain new counsel.

WHEREFORE, it is respectfully requested from this Honorable Court to grant the present motion to withdraw as co-counsel in the case.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Court using the CM/ECF system, which will send notification of such filing to the parties appearing in said system, including the Assistant US Trustee, Monsita Lecaroz, Esq., and by first class mail to:

- a. Eusebio Ramos Morales, Bishop, HC 04 Box 44015, Caguas, Puerto Rico 00727-9639.

- b. Father Miguel De Angel Ramirez, Vicario de Administracion for the Diocese of Caguas, HC 04 Box 44015, Caguas, Puerto Rico 00727-9639.
- c. Father Victor Ramon Santiago Mateo, Vicario General for the Diocese of Fajardo-Humacao, PO Box 888, Fajardo, Puerto Rico 00738-0888.
- d. Father Robert B. Medina Radesco, Diocese of Fajardo-Humacao, PO Box 888, Fajardo, Puerto Rico 00738-0888.
- e. Mons. Roberto Gonzalez, Archbishop for the Archdiocese, PO Box 9021967, San Juan, Puerto Rico 00902.

In San Juan, Puerto Rico, this 15th day of April 2020.

/s/ Mary Ann Gandía-Fabián
GANDIA FABIAN LAW OFFICE
USDC # 202610
PO BOX 270251
SAN JUAN, PR 00927
Tel: 787-390-7111
Fax: 787-729-2203
gandialaw@gmail.com